

Bryan Reo

From: Raymond Vasvari <vasvari@vasvarilaw.com>
Sent: Wednesday, August 31, 2022 10:49 AM
To: Bryan Reo
Cc: K. Ann Zimmerman
Subject: Re: Posts

Follow Up Flag: Follow up
Flag Status: Flagged

Mr. Reo:

I have worked on nothing but responding to you oppressive and overbroad discovery requests since Friday. You have answers to your requests for admissions (timely tendered) and your interrogatories (one day late with due warning that they would which you acknowledged, and late in part because of my having to address more than 30 emails you sent between dinner and midnight on Sunday, 28 August, 2022). You would have had your responses to requests for production today, but for these motions. They are largely done. Now, the time I intended to spend completing them will be spent addressing your improperly filed motions).

Two days late. With notice they would be late. I think you misunderstand the rules and the Court if you think this is cause for alarm. I have done nothing but make a good faith effort to get you what you were entitled to in a timely manner.

You have evinced in writing an intention to use collateral motions to intimidate and browbeat my client, and spend her money, almost from the start. You have done so repeatedly and in writing.

- You have threatened to file a Rule 11 motion against me if I attempted to assert a qualified privilege defense, weeks before any such motion is do.
- You have informed me that you had Rule 11 motions prepared to file at a point in the case where I had filed nothing but a Notice of Appearance and an Opposition to your Motion for Early Discovery, which Motion you withdrew within hours of my filing.
- You threatened to move to compel if my discovery responses arrived five minutes after midnight, despite your being so unfamiliar with the Rules as to insist they be produced on a Sunday.
- You have engaged in direct contact with my client behind my back after you were instructed to stop, and after you said you would stop, in an effort to undermine the attorney–client relationship and – despite your artless protestations – resolve this case by renewing a romantic relationship in which she has no interest.

- In emails to my client, on which I was not copied, you implicitly linked the resolution of this case to your willingness to dismiss criminal charges you filed against my client in Belgium.

You lack insight Mr. Reo.

You are combative, unprofessional, personally insulting and at times bizarre.

You also fail to realize that you have engaged in serious misconduct.

Nor is it misconduct that I can ignore. You have written things and done things which directly reflect upon your fitness as an attorney. I am not exaggerating and not making loose allegations. I have it all in writing, and you are the writer.

Until now I had hoped to calm your overzealous abuses by being that much more civil. I had hoped to walk you back to the path of collegiality. That has not worked.

Withdraw your motions. They are improper and filed out of Rule.

I will be responding to your motions and seeking to have them stricken, or in the alternative set a fixed time within which to respond.

As for involving the Court, the die is cast. Certain of your documented misconduct is such that I have an ethical duty to report it. I have consulted with outside counsel in an effort to ascertain my obligations. I have devoted hours to those consultations in the past ten days. The decision to report your misconduct was taken days ago. Two very senior members of the bar have already agreed to represent me in any collateral matters involving you. Your aggressive misconduct has wasted my time and my client's money. It must stop.

If your motions are not withdrawn by Noon, I will move to strike.

The question of reporting your misconduct and strange behavior is not negotiable. My duty to report is mandatory and it would be improper to bargain with it.

Yours sincerely,

Raymond V. Vasvari, Jr.

Vasvari | Zimmerman
attorneys & counselors-at-law

20600 Chagrin Boulevard
Suite 800 Tower East
Shaker Heights, Ohio 44122-5353
vasvari@vasvarilaw.com
www.vasvarilaw.com
t 216.458.5880
f 216.302.3700

CONFIDENTIALITY NOTICE: This message may contain confidential and/or privileged material. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message. If you are the intended recipient but do not wish to receive communications through this medium, please so advise the sender immediately.

IRS CIRCULAR 230 DISCLOSURE: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code, or (ii) promoting, marketing or recommending to another party any matters addressed herein.

From: Bryan Reo <reo@reolaw.org>
Date: Wednesday, August 31, 2022 at 10:20 AM
To: Raymond Vasvari <vasvari@vasvarilaw.com>
Subject: RE: Posts

I anticipated you might be true to your word and would provide responses to interrogatories Tuesday morning, and responsive documents to outstanding Rule 34 requests at the same time or certainly before the end of Tuesday.

I suggest we should involve the court at this time.

From: Raymond Vasvari <vasvari@vasvarilaw.com>
Sent: Wednesday, August 31, 2022 10:00 AM
To: Bryan Reo <reo@reolaw.org>
Subject: Re: Posts

Mr. Reo:

I awoke to motions I did not anticipate given our discussion over the past days via email.

Your motions to compel are out of order. Please withdraw them.

I have been very patient with you and your remarkably aggressive and unprofessional conduct until now.

But you have crossed a line and it is plain that my efforts to move you toward a more collegial approach have been in vain.

Withdraw your motions. Through your motions, emails and abuse you are building a case for a Section 1927 motion against you that I would prefer not to file. But your insistence on acting as you have is making that inevitable.

Yours sincerely,

Raymond V. Vasvari, Jr.

Vasvari | Zimmerman
attorneys & counselors-at-law

20600 Chagrin Boulevard
Suite 800 Tower East
Shaker Heights, Ohio 44122-5353
vasvari@vasvarilaw.com
www.vasvarilaw.com
t 216.458.5880
f 216.302.3700

CONFIDENTIALITY NOTICE: This message may contain confidential and/or privileged material. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message. If you are the intended recipient but do not wish to receive communications through this medium, please so advise the sender immediately.

IRS CIRCULAR 230 DISCLOSURE: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code, or (ii) promoting, marketing or recommending to another party any matters addressed herein.

From: Bryan Reo <reo@reolaw.org>
Date: Wednesday, August 31, 2022 at 7:28 AM
To: Raymond Vasvari <vasvari@vasvarilaw.com>
Subject: Re: Posts

As far as I am concerned this is useless. I need access to the actual account.

Ms. Reynaud almost certainly logged in and reactivated what had been, since March 31 2022 a deactivated account, logging in to reactivate around August 23 2022, for the purpose of deleting private messages.

She said she has been using social media message services to communicate with non-lawyers about me and about this case.

I want her Quora private messages, what they were before she deleted them over the last few weeks.

--

Bryan Anthony Reo (#0097470)
REO LAW LLC
P.O. Box 5100
Mentor, Ohio 44061
(Business): (216) 505-0811
(Personal): (440) 313-5893

Admissions- Ohio Courts and Agencies [#0097470], Michigan Courts and Agencies [#P84119], N.D. Ohio, S.D. Ohio, E.D. Michigan, W.D. Michigan, United States Court of Appeals for the 3rd Circuit, United States Court of Appeals for the 6th Circuit, and the United States Court of Appeals for the Armed Forces (#37033)

This electronic mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain private, confidential, and/or privileged information. Any unauthorized review, use, disclosure, or distribution is strictly prohibited, and interception of the same is a federal criminal offense per 18 U.S.C. § 2511. If you are not the intended

recipient of this message or their agent, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message and any attachments. If you are not the intended recipient, you are hereby notified that any use, dissemination, copying, or storage of this message or its attachments is strictly prohibited.

On August 30, 2022 11:31:48 PM Raymond Vasvari <vasvari@vasvarilaw.com> wrote:

Dear Mr. Reo:

I promise you something tonight and your early morning email yesterday expressed your particular interest in the Quora posts. I have obtained them and they are attached hereto. I note that they are not embraced in your Requests for Production, but do constitute social media of the sort embraced by your withdrawn subpoena. Here they are, as a gesture of good faith on that discovery dispute. I do not concede their relevance or admissibility, but said I would provided them.

Yours sincerely,

Raymond V. Vasvari, Jr.

Vasvari | Zimmerman
attorneys & counselors-at-law

20600 Chagrin Boulevard
Suite 800 Tower East
Shaker Heights, Ohio 44122-5353

vasvari@vasvarilaw.com

www.vasvarilaw.com

t 216.458.5880

f 216.302.3700

CONFIDENTIALITY NOTICE: This message may contain confidential and/or privileged material. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message. If you are the intended recipient but do not wish to receive communications through this medium, please so advise the sender immediately.

IRS CIRCULAR 230 DISCLOSURE: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code, or (ii) promoting, marketing or recommending to another party any matters addressed herein.